## REMARKS

Claims 1-27 are pending. Independent claims 1 and 27 have been amended. Claims 1-27 were rejected under 35 U.S.C. §103(a) as obvious in view of Dandurand ("Market Niche Analysis In the Casino Gaming Industry," Journal of Gambling Studies, Vol. 6(1), Spring 1990), considered alone and in combination with Sheppard (U.S. Patent No. 6,026,397).

Claims 1 and 27 have been amended to recite that subgroups may be formed from a group of players (or individuals) by utilizing the differences in attributes. For example, Fig. 4A shows how each player in a main or first group has one or more attributes in common with all other players in the group. However, each player also has other attributes which he or she has in common with only specific other players (some within the first group and some outside the first group). These other common attributes may be used to identify distinct subgroups. The present invention identifies such subgroups within the first group and within other subgroups with reference to the differences between the attributes of the player in the first group or the subgroup. (page 16, lines 13-20). Referring to Fig. 3, the attributes of the player in the first group are analyzed to identify one or more differences that may be used to create one or more subsets of individuals, where each such difference is referred to as a single relational polymorphism.

Embodiments of the invention defined in the independent claims provide several benefits. For example, individuals in the first subset share certain attributes, allowing a promotional offering to precisely reflect the attributes of the players to whom it is offered. (page 19, lines 1-7). "The marketing or promotional strategy . . . may then be refined based on any of the SRPs identified." (page 19, lines 1-2). Another benefit is ease of analysis and computation. Grouping individuals based on parameter differences and similarities does not require excessive time, resources, research, or data interpretation. (page 18, lines 14-20). This efficiency allows

marketing and promotional strategies to be precisely targeted and changed without further analytical effort, such as complex statistical analysis.

Dandurand fails to disclose or suggest features of claims 1 and 27, such as "querying the relational database to determine a further subset of the first subset of the individuals having a second at least one of the plurality of attributes in common." Rather, Dandurand suggests characterizing a group of players according to average statistical information and determining a marketing strategy based on those statistical averages. (Dandurand, p. 84, P 2). However, the problem remains that not all individuals in the group will share the average characteristics for the group. (See Dandurand, p. 83, Table 2). In Dandurand's example, the "typical" premium slot player may desire "personal attention, a comfortable seat, a place to guard her purse, a clean playing area, and a well-lighted alcove of the casino." (Dandurand, p. 84, P 2). However, there may be players in the same premium group who would prefer different accommodations since "[e]ach consumer is unique and has different preferences." (Dandurand, p. 85, P 1). By the same token, Dandurand teaches modifying accommodations to account for average characteristics of niche groups, not defining "a promotional offering in association with the identified selected ones of the plurality of attributes shared by the individuals in the further subset," as recited in claim 27.

Dandurand also fails to disclose or show the newly added limitations described above. The reference does teach using common attributes to identify distinct groups based on the differences among the attributes and how these attributes are analyzed to identify one or more differences that may be used to create the one or more subsets of players.

Sheppard fails to disclose awarding a promotional offering in a gaming environment based on shared attributes, and makes no mention of features such as "identifying selected ones of the plurality of attributes shared by the individuals in the further subset to define a promotional offering in association with the identified selected ones of the plurality of attributes

shared by the individuals in the further subset." Sheppard describes a complex but generic clustering analysis of data records. Thus, for example, Sheppard does not provide for grouping players by shared attributes and distinguishing players by mutually exclusive differences, as provided by embodiments of claims 1 and 27. (page 19, lines 1-4). Such a grouping allows the determination of promotional offerings more specifically tailored for each customer, thus ensuring optimal distribution and efficient use of a casino's promotional resources. (page 19, lines 4-7).

Because claims 1 and 27 recites features which Dandurand and Sheppard fail to teach, considered alone or in combination, these claims are patentable in view of the cited references.

Accordingly, the rejections of these claims under 35 U.S.C. §103 should be withdrawn for similar reasons as above. Reconsideration is respectfully requested.

Their remaining dependent claims incorporate the features of the independent claims on which the dependent claims are based. Therefore, the rejections of the dependent claims should be withdrawn for at least the same reasons as claims 1 and 27.

## CONCLUSION

The claims are believed to be in condition for allowance. Accordingly, allowance of the claims at the earliest possible date is requested.

If prosecution of this application can be assisted by telephone, the Examiner is requested to call the undersigned attorney at (612) 252-3335.

Applicant does not believe that any additional fees are required to facilitate the filing of this Amendment. However, if it is determined that such fees are due, please charge such additional fees to Deposit Account No. 500388 (Order No. IGT1P048).

Respectfully submitted,
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